

H10U4  
H4AR  
125.1  
10/9/09



## Surface Water Data Report

Susan McGroddy

to:

Ravi Sanga

10/09/2009 05:22 PM

Cc:

dan berlin, "Dave Schuchardt (Dave.Schuchardt@Seattle.Gov)", "Debra Williston ((b) (6))", "Debra Williston (debra.williston@kingcounty.gov)", Doug Hotchkiss, Gary Pascoe, "Jeff Stern (jeff.stern@kingcounty.gov)", Nancy Judd, "Pete Rude (pete.rude@seattle.gov)", Scott Becker, Susan McGroddy, "twang@anchorenv.com"

Hide Details

From: Susan McGroddy &lt;SusanM@windwardenv.com&gt; Sort List...

To: Ravi Sanga/R10/USEPA/US@EPA

Cc: dan berlin <dberlin@anchorenv.com>, "Dave Schuchardt (Dave.Schuchardt@Seattle.Gov)" <Dave.Schuchardt@Seattle.Gov>, "Debra Williston ((b) (6))" <((b) (6))>, "Debra Williston (debra.williston@kingcounty.gov)" <debra.williston@kingcounty.gov>, Doug Hotchkiss <hotchkiss.d@portseattle.org>, Gary Pascoe <((b) (6))>, "Jeff Stern (jeff.stern@kingcounty.gov)" <jeff.stern@kingcounty.gov>, Nancy Judd <NancyJ@windwardenv.com>, "Pete Rude (pete.rude@seattle.gov)" <pete.rude@seattle.gov>, Scott Becker <sbecker@integral-corp.com>, Susan McGroddy <SusanM@windwardenv.com>, "twang@anchorenv.com" <twang@anchorenv.com>

History: This message has been replied to and forwarded.

## 2 Attachments



Response to EPA comments on SW data report.doc EW Surface Water Data Rpt 10-09-09.doc

Ravi,

Here is the Draft Final Surface Water Data Report and the responses to EPA comments. Please let me know if you have any questions or concerns.

Thanks.  
Susie

USEPA SF



1387143

## **Response to US EPA Comments. Draft Surface Water Data Report, East Waterway Operable Unit, Supplemental Remedial Investigation and Feasibility Study, July 1, 2009**

### **Comments**

1. Page 8. Section 3. Laboratory Methods. It appears that conductivity was measured in the field as well as at the laboratory. Please state, in this section, that this was the case. Please add conductivity measurements at the laboratory to Table 3-1. Also explain which data set is included in the database.

**Response: Conductivity measurements are included in the text.**

2. Page 10. Section 4.1. Table 4.1. Please include a rationale or footnoted explanation regarding why Toxicity Equivalents have been calculated for PCB congeners in water.

**Response: TEQ values were calculated to facilitate comparison with other datasets in which TEQ values were calculated. TEQs can be removed if necessary.**

3. Page 17. Section 4.2. Second paragraph. Given the procedures Brooks Rand Labs (BRL) used to revise MDLs and RLs for metals samples, the definitions of the MDL and RL are not applicable to some of the metals data. These definitions must be updated. Also see comment 5.

**Response: Text was added to address comment.**

4. Page 17. Section 4.2. Third paragraph. This paragraph is misleading. The highest RL for zinc is a measured concentration that was restated as undetected as the result of blank contamination. The MDL is not applicable in this case. The statement, "The respective MDL for this sample was below the zinc ACG" is immaterial but implies that the data are sufficient to establish a concentration below the ACG. The RL is above the ACG, and we cannot determine whether the zinc concentration in this sample is above or below the ACG because of the blank contamination.

**Response: Comment addressed.**

5. Page 17. Section 4.2. Fourth paragraph and Table 4-3. Again, comparing ACGs to the MDL is misleading when data are only reported to the RL and contamination is possible. Please modify the text and table to clarify this situation.

**Response: Comment addressed.**

6. Page 17. Section 4.2 and BRL data packages. It is not clear why zinc results are restated to the RL in the database and why the RL and MDL are modified by Brooks Rand Lab based on method blank contamination. Both the MDL that is established per 40 CFR 136 and the RL that is based on the lowest calibration curve are valid, regardless of the performance of the method blanks. The usability of data may be diminished when data are restated from a measured concentration to an elevated MDL or RL that is greater than the measured concentration. In the case of zinc, Round 1 data were restated from a concentration below the ACG to the modified RL, which is above the ACG. This is not necessary and renders the data less useful for risk assessment. Measurements must be based on MDL and RL values established per method requirements and concentrations must not be elevated above the measured concentration, only restated as undetected if warranted based on method blank results or results for other blanks. BRL must change the way they report data. MDLs and RLs must be used as described in method 1640. Zinc data and other appropriate metals must be restated in the revised data report accordingly. Please contact EPA regarding any questions in resolving this issue.

**Response: Following our call with EPA and Brooks Rand the reporting limit and method detection limit for zinc was changed. Comment is addressed.**

7. Appendix C. Several appendices to the Data Validation Report are cited in the project narrative of the report. These must be included with the report.

**Response: The appendices have been included.**

8. Appendix C. Page SVOC-2 and others. Under *Holding Time and Sample Preservation*, please provide a temperature range for coolers that were received outside the range of 2 – 6 °C to substantiate the decision not to qualify data based on cooler temperatures. If samples did not have time to cool to below 6°C from the time of collection as was implied in the case narrative, this must be stated.

**Response: Appendix C has been revised to address this issue.**

9. Appendix C. Page SVOC-2 and page 21 of the main text. Page 21 of the main text states that results for aniline and n-nitrosodimethylamine were rejected because no initial calibration was completed. This oversight is not addressed in Appendix C, which states that data for these SVOCs were rejected because of LCS results and that missing results were generated from the original instrument data. Please clarify.

**Response: Comment has been addressed in main text and Appendix C.**